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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,

Debtors.¹**

Chapter 11

**Case No. 19-23649 (RDD)

(Jointly Administered)**

**NOTICE OF THE DEBTORS' FIRST SET OF
REQUESTS FOR THE PRODUCTION OF DOCUMENTS**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

PLEASE TAKE NOTICE that on June 3, 2021, the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601 (the “**Bankruptcy Court**”) issued the *Second Amended Order Granting Debtors’ Motion for Order Establishing Confirmation Schedule and Protocols* [Dkt. No. 2989] (the “**Protocols Order**”), establishing a schedule and protocols in connection with the Debtors’ request for confirmation of Debtors’ proposed plan of reorganization (the “**Plan**”), including a hearing on Debtors’ request for confirmation of the Plan (the “**Confirmation Hearing**”).

PLEASE TAKE FURTHER NOTICE that on June 4, 2021, pursuant to the Protocols Order, the Debtors served requests for production of documents on certain parties that have identified themselves through public filings as potential objectors to the Plan. Any party that has received such requests for production of documents is not subject to the requests for production of documents attached hereto, and should respond to such specific requests served by the Debtors

PLEASE TAKE FURTHER NOTICE that, in an effort to reach any party in interest who intends to offer any evidence in connection with any objection to confirmation of the Plan, the Debtors hereby file the following requests for production of documents (“**Requests**”), which are **DIRECTED TO ANY PARTY IN INTEREST THAT INTENDS TO OFFER ANY EVIDENCE IN CONNECTION WITH ANY OBJECTION TO CONFIRMATION OF THE PLAN (AND THAT HAS NOT BEEN SERVED WITH A SPECIFIC REQUEST FOR PRODUCTION):**

- The *Debtors' First Set of Requests for Production of Documents to Certain Holders of Non-Federal Domestic Governmental Claims*, which is attached hereto as **Exhibit A**;
- The *Debtors' First Set of Requests for Production of Documents to Certain Holders of Tribe Claims*, which is attached hereto as **Exhibit B**;
- The *Debtors' First Set of Requests for Production of Documents to Certain Holders of Hospital Claims*, which is attached hereto as **Exhibit C**;
- The *Debtors' First Set of Requests for Production of Documents to Certain Holders of Third-Party Payor Claims*, which is attached hereto as **Exhibit D**;
- The *Debtors' First Set of Requests for Production of Documents to Certain Holders of NAS PI Claims*, which is attached hereto as **Exhibit E**;
- The *Debtors' First Set of Requests for Production of Documents to Certain Holders of Non-NAS PI Claims*, which is attached hereto as **Exhibit F**;
- The *Debtors' First Set of Requests for Production of Documents to Certain Holders of Other General Unsecured Claims*, which is attached hereto as **Exhibit G**;
- The *Debtors' First Set of Requests for Production of Documents to Certain Holders of Co-Defendant Claims*, which is attached hereto as **Exhibit H**; and
- The *Debtors' First Set of Requests for Production of Documents to Certain Holders of Other Subordinated Claims*, which is attached hereto as **Exhibit I**.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Protocols Order, any party who intends to or may object to the Plan at the Confirmation Hearing must provide a response to Debtors regarding any applicable Requests by **June 14, 2021**.

PLEASE TAKE FURTHER NOTICE that the Debtors stand ready to meet and confer with any party to discuss the Requests and any questions such parties may have regarding the Requests.

PLEASE TAKE FURTHER NOTICE that any party that intends to or may object to the Plan at the Confirmation Hearing in any manner must substantially complete production of any materials that are responsive to any of the Requests to the Debtors by **June 25, 2021**.

PLEASE TAKE FURTHER NOTICE failure to produce materials responsive to the Requests may result in a waiver of your ability to introduce evidence in support of any objection you may have to the confirmation of the Plan.

PLEASE TAKE FURTHER NOTICE that copies of all papers filed in the Chapter 11 Cases may be obtained free of charge by visiting the website of Prime Clerk LLC at <https://restructuring.primeclerk.com/purduepharma>. You may also obtain copies of any pleadings by visiting the Bankruptcy Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: June 4, 2021
New York, New York

By: /s/ Marc J. Tobak

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